

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PROMOS TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-788-JJF
)	
FREESCALE SEMICONDUCTOR, INC.,)	
)	
Defendant.)	

**PLAINTIFF PROMOS TECHNOLOGIES, INC.'S
AMENDED NOTICE OF SUBPOENA AND DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, plaintiff ProMOS Technologies, Inc. will be serving a subpoenas upon non-party William C. Moyer in the form attached hereto.

The subpoena for Mr. Moyer seeks production of documents by November 2, 2007 and appearance for a deposition before a person authorized to administer an oath at the offices of Fulbright & Jaworski, 600 Congress Ave. #2400, Austin, Texas 78701 on November 7, 2007, commencing at 9:00 a.m. and continuing from day to day until completed. The deposition may be recorded by audio-visual means as well as stenographically.

ASHBY & GEDDES

/s/ Lauren E. Maguire

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Dated: October 30, 2007
185455.1

SAO88 (Rev. 12/06) Subpoena in a Civil Case

**Issued by the
UNITED STATES DISTRICT COURT**

in the Western

DISTRICT OF

Texas

ProMOS Technologies, Inc.

SUBPOENA IN A CIVIL CASE

V.

Freescale Semiconductor, Inc.

Case Number:¹ C.A. No. 06-788 (D. Del.)

TO: William C. Moyer
111 Meadow Ridge Drive
Dripping Springs, TX 78620

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

- ☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Fulbright & Jaworski, 600 Congress Ave # 2400 Austin, Texas 78701	11/7/2007 9:00 am

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

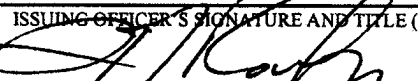
See Exhibit A

PLACE	DATE AND TIME
6501 William Cannon Drive West Austin, Texas 78735	11/2/2007 9:30 am

- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
	10/30/2007

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Steven J. Routh, Esq., Hogan & Hartson LLP, 555 Thirteenth Street, NW, Washington DC 20004
(202) 637-6472

(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

AO88 (Rev. 12/06) Subpoena in a Civil Case

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject

to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) **CONTEMPT.** Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).

EXHIBIT A

DEFINITIONS

A. The terms “you” and “your,” as used herein, mean William Moyer and any entities or persons acting or purporting to act for or on behalf of, or who are subject to the direction or control of William Moyer, including but not limited to agents, employees, officers, directors, attorneys, consultants, contractors, subcontractors and representatives.

B. The term “Freescall,” as used herein, means Freescall Technologies, Inc., any and all predecessors and successors thereof, including but not limited to Motorola, Inc., any parent entities, subsidiaries, divisions, affiliates, and branches of the foregoing entities, any wholly or partly owned entities of the foregoing, and any entities acting or purporting to act for or on behalf of, or who are subject to the direction or control of, any of the foregoing entities, including agents, employees, officers, directors, attorneys, consultants, contractors, subcontractors and representatives.

C. The singular of any noun used herein should be understood to include the plural and vice versa.

D. The term “document” is used in its broadest sense and has the same meaning as “documents” as defined in Federal Rule of Civil Procedure 34(a), including without limitation, the original and all non-identical copies of any written, typed, printed, photocopied, photographic, electronic, machine-readable, or magnetically or optically recorded matter of any kind, including letters, envelopes, forms, affidavits, correspondence, telegraphs, telecopies, telefaxes, paper communications, electronic communications, signed statements, tabulations, charts, memoranda, checks, appointment books, records, proposals, memoranda or other transcriptions by mechanical device, by longhand or shorthand recording, tape recorded or recorded by electronic or any other means, computer-generated information, computer-stored information, computer software, computer programs, intraoffice communications, interoffice communications, all summaries of oral communications, telephonic or otherwise, microfiche, microfilm, lists, bulletins, calendars, circulars, desk pads, opinions, ledgers, minutes, agreements, journals, diaries, contracts, invoices, balance sheets, telephone messages or other messages, magazines, pamphlets, articles, notices,

1 newspapers, studies, summaries, worksheets, telexes, cables and all other graphic materials,
 2 writings and instruments, however produced or reproduced. A document includes all documents
 3 appended thereto.

4 E. The terms "and" and "or," as used herein, is construed either disjunctively or
 5 conjunctively as necessary to bring within the scope of the discovery request all responses that
 6 might otherwise be construed to be outside of its scope.

7 F. The terms "relate to" or "relating to," as used herein, means concerning, citing,
 8 quoting, regarding, involving, representing, evidencing, constituting, discussing, mentioning,
 9 containing, analyzing, supporting, embodying, reflecting, identifying, incorporating, describing,
 10 commenting on, referring to, considering, recommending, dealing with or pertaining to in whole
 11 or in part.

12 G. The term "include" or "including," as used herein, means including without
 13 limitation.

14 H. The term "communications," as used herein, includes written material, including
 15 correspondence, memoranda, minutes, notes and buck slips; e-mail and other computer messages;
 16 recorded audio and/or video messages; and oral communications, including meetings,
 17 conversations, conferences and telephone calls.

18 I. The word "each" shall mean both "each" and "every," and the word "every" shall
 19 mean "each" and "every," as appropriate in order to bring within the scope of these
 20 interrogatories information and documents which might otherwise be considered to be beyond
 21 their scope.

22 J. The term "Freescale Products," as used herein, shall mean any and all of the
 23 Freescale products listed below:

<u>Product</u>	<u>Core</u>	<u>Description</u>
24 MPC5200	603e core	16 KB instruction cache / 16 KB data cache
25 MPC5200B	603e core	16 KB instruction cache / 16 KB data cache
	e200z1 core,	
	optional	
26	secondary	L1: 1MB or 512 KB embedded flash; plus memory
27 MPC5510	e200z0 core	management unit with buffer
		L1 (U-Cache): 8KB; L2: 64KB cache; 1.5MB embedded
28 MPC5553	e200z6 core	flash; plus memory management unit with buffer

1			L1 (U-Cache): 32KB; L2: 64KB cache; 2MB embedded
2	MPC5554	e200z6 core	flash; plus memory management unit with buffer
3	MPC5561	e200z6 core	L1 (U-Cache): 32KB; L2: 192KB cache; 1MB embedded
4	MPC5565	e200z6 core	flash; plus memory management unit with buffer
5	MPC5566	e200z6 core	L1 (U-Cache): 8KB; L2: 64KB cache; 2MB embedded
6	MPC5567	e200z6 core	flash; plus memory management unit with buffer
7	MPC7410	G4/e600 core	L1 (U-Cache): 32KB; L2: 128KB cache; 3MB embedded
8	MPC7445	G4/e600 core	flash; plus memory management unit with buffer
9	MPC7455	G4/e600 core	L1 (U-Cache): 8KB; L2: 64KB cache; 2MB embedded
10	MPC7447	G4/e600 core	flash; plus memory management unit with buffer
11	MPC7457	G4/e600 core	L1 (U-Cache): 8KB; L2: 64KB cache; 2MB embedded
12	MPC7447A	G4/e600 core	flash; plus memory management unit with buffer
13	MPC7448	G4/e600 core	32 KB instruction cache / 32 KB data cache; L2 cache:
14	MPC823	8xx core	256 KB to 1 MB
15	MPC823E	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
16	MPC850	8xx core	256 KB to 1 MB
17	MPC852T	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
18	MPC853T	8xx core	256 KB to 1 MB
19	MPC855T	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
20	MPC857DSL	8xx core	256 KB to 1 MB
21	MPC857T	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
22	MPC859DSL	8xx core	256 KB to 1 MB
23	MPC859T	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
24	MPC860	8xx core	256 KB to 1 MB
25	MPC860P	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
26	MPC862	8xx core	256 KB to 1 MB
27	MPC866	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
28	MPC870	8xx core	256 KB to 1 MB
	MPC875	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
	MPC880	8xx core	256 KB to 1 MB
	MPC885	8xx core	32 KB instruction cache / 32 KB data cache; L2 cache:
	MPC8247	603e core	256 KB to 1 MB
	MPC8248	603e core	32 KB instruction cache / 32 KB data cache; L2 cache:
	MPC8250	G2 core	256 KB to 1 MB
	MPC8255	(603e der.)	32 KB instruction cache / 32 KB data cache; L2 cache:
		G2 core	256 KB to 1 MB
		(603e der.)	32 KB instruction cache / 32 KB data cache; L2 cache:

1		G2 core	
2	MPC8260	(603e der.)	16 KB instruction cache / 16 KB data cache
3	MPC8264	G2 core (603e der.)	16 KB instruction cache / 16 KB data cache
4	MPC8265	G2 core (603e der.)	16 KB instruction cache / 16 KB data cache
5	MPC8266	G2 core (603e der.)	16 KB instruction cache / 16 KB data cache
6	MPC8270	603e core	16 KB instruction cache / 16 KB data cache
7	MPC8271	603e core	16 KB instruction cache / 16 KB data cache
8	MPC8272	603e core	16 KB instruction cache / 16 KB data cache
9	MPC8275	603e core	16 KB instruction cache / 16 KB data cache
10	MPC8280	603e core	16 KB instruction cache / 16 KB data cache
11	MPC8313	e300 core	16 KB instruction cache / 16 KB data cache
12	MPC8313E	e300 core	16 KB instruction cache / 16 KB data cache
13	MPC8321	e300c2 core	16 KB instruction cache / 16 KB data cache
14	MPC8321E	e300c2 core	16 KB instruction cache / 16 KB data cache
15	MPC8323	e300c2 core	16 KB instruction cache / 16 KB data cache
16	MPC8323E	e300c2 core	16 KB instruction cache / 16 KB data cache
17	MPC8343E	e300 core	32 KB instruction cache / 32 KB data cache
18	MPC8347E	e300 core	32 KB instruction cache / 32 KB data cache
19	MPC8349E	e300 core	32 KB instruction cache / 32 KB data cache
20	MPC8358E	e300 core	32 KB instruction cache / 32 KB data cache
21	MPC8360E	e300 core	32 KB instruction cache / 32 KB data cache
22			32 KB instruction cache / 32 KB data cache; L2 cache:
23	MPC8533E	e500 v2 core	256 KB
24			32 KB instruction cache / 32 KB data cache; L2 cache:
25	MPC8540	e500 core	256 KB
26			32 KB instruction cache / 32 KB data cache; L2 cache:
27	MPC8541E	e500 core	256 KB
28			32 KB instruction cache / 32 KB data cache; L2 cache:
29	MPC8543E	e500 core	256 KB
30			32 KB instruction cache / 32 KB data cache; L2 cache:
31	MPC8544E	e500 core	256 KB
32			32 KB instruction cache / 32 KB data cache; L2 cache:
33	MPC8545E	e500 core	512 KB
34			32 KB instruction cache / 32 KB data cache; L2 cache:
35	MPC8547E	e500 core	512 KB
36			32 KB instruction cache / 32 KB data cache; L2 cache:
37	MPC8548E	e500 core	512 KB
38			32 KB instruction cache / 32 KB data cache; L2 cache:
39	MPC8555E	e500 core	256 KB
40			32 KB instruction cache / 32 KB data cache; L2 cache:
41	MPC8560	e500 core	256 KB
42			32 KB instruction cache / 32 KB data cache; L2 cache:
43	MPC8567E	e500 core	512 KB
44			32 KB instruction cache / 32 KB data cache; L2 cache:
45	MPC8568E	e500 core	512 KB

1			1 MB L2 cache; 32 KB instruction cache / 32 KB data
2	MPC8641	e600 core	cache; Dual 64-bit DDR and DDR2 memory controllers
3		Dual e600	1 MB L2 cache per core; 32 KB instruction cache / 32 KB
4	MPC8641D	core	data cache; Dual 64-bit DDR and DDR2 memory
5	MCF5206e	ColdFire V2	controllers
6	MCF5207	ColdFire V2	4KB I-Cache; 8 KB SRAM
7	MCF5208	ColdFire V2	8KB I/D-Cache; 16KB SRAM
8			8KB I/D-Cache; 16KB SRAM
9			16KB SRAM; 128 KB Embedded Flash memory (No
10	MCF5211	ColdFire V2	cache?)
11			32KB SRAM; 256 KB Embedded Flash memory (No
12	MCF5212	ColdFire V2	cache?)
13			32KB SRAM; 256 KB Embedded Flash memory (No
14	MCF5213	ColdFire V2	cache?)
15			2KB I-Cache; 64KB SRAM; 256 KB Embedded Flash
16	MCF5214	ColdFire V2	memory
17			2KB I-Cache; 64KB SRAM; 512 KB Embedded Flash
18	MCF5216	ColdFire V2	memory
19	MCF5232	ColdFire V2	8KB configurable I/D-Cache; 64KB SRAM
20	MCF5233	ColdFire V2	8KB configurable I/D-Cache; 64KB SRAM
21	MCF5234	ColdFire V2	8KB configurable I/D-Cache; 64KB SRAM
22	MCF5235	ColdFire V2	8KB configurable I/D-Cache; 64KB SRAM
23	MCF5249	ColdFire V2	8KB I/D-Cache; 96KB SRAM
24	MCF5270	ColdFire V2	8KB configurable Cache; 64KB SRAM
25	MCF5271	ColdFire V2	8KB configurable Cache; 64KB SRAM
26	MCF5272	ColdFire V2	1KB I-Cache; 4KB SRAM
27	MCF5274	ColdFire V2	16KB configurable Cache; 64KB SRAM
28	MCF5274L	ColdFire V2	16KB configurable Cache; 64KB SRAM
29	MCF5275	ColdFire V2	16KB configurable Cache; 64KB SRAM
30	MCF5275L	ColdFire V2	16KB configurable Cache; 64KB SRAM
31	MCF5280	ColdFire V2	2KB I-Cache; 64KB SRAM
32			2KB I-Cache; 64KB SRAM; 256 KB Embedded Flash
33	MCF5281	ColdFire V2	memory
34			2KB I-Cache; 64KB SRAM; 512 KB Embedded Flash
35	MCF5282	ColdFire V2	memory
36	MCF5307	ColdFire V3	8KB unified Cache; 4KB SRAM
37	MCF5327	ColdFire V3	16KB I/D-Cache; 32KB SRAM
38	MCF5328	ColdFire V3	16KB I/D-Cache; 32KB SRAM
39	MCF5329	ColdFire V3	16KB I/D-Cache; 32KB SRAM
40	MCF5372	ColdFire V3	16KB I/D-Cache; 32KB SRAM
41	MCF5372L	ColdFire V3	16KB I/D-Cache; 32KB SRAM
42	MCF5373	ColdFire V3	16KB I/D-Cache; 32KB SRAM
43	MCF5373L	ColdFire V3	16KB I/D-Cache; 32KB SRAM
44	MCF5407	ColdFire V4	16KB I-Cache; 8KB D-Cache; 4KB SRAM
45	MCF5470	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
46	MCF5471	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
47	MCF5472	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
48	MCF5473	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM

1	MCF5474	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
	MCF5475	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
2	MCF5480	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
3	MCF5481	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
	MCF5482	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
4	MCF5483	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
	MCF5484	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
5	MCF5485	ColdFire V4e	32KB I-Cache; 32KB D-Cache; 32KB SRAM
	MC68060	MC68060	Dual 8KB on-chip Caches
6	MC68LC060	MC68060	Dual 8KB on-chip Caches
	MC68EC060	MC68060	Dual 8KB on-chip Caches
7	i.MX1	ARM920T	
8	(MC9328MX1)	core	16KB instruction Cache, 16KB data Cache
		ARM926EJ-	
9	i.MX21	S core	16KB instruction Cache, 16KB data Cache
		ARM926EJ-	
10	i.MX21S	S core	16KB instruction Cache, 16KB data Cache
		ARM926EJ-	
11	i.MX27	S core	16KB instruction Cache, 16KB data Cache
12		ARM1136JF-	16KB instruction Cache, 16KB data Cache; L2: 128 KB
	i.MX31	S core	unified Cache
13		ARM1136JF-	16KB instruction Cache, 16KB data Cache; L2: 128 KB
	i.MX31L	S core	unified Cache
14		ARM920T	
15	i.MXL	core	16KB instruction Cache, 16KB data Cache
		ARM920T	
16	i.MXS	core	16KB instruction Cache, 16KB data Cache
		Four 800	
17		MHz/1 GHz	Four 16-Kbyte L1 instruction cache (one per core); Four
18		StarCore	32-Kbyte L1 data cache (one per core); One 128-Kbyte
		SC3400 DSP	shared L2 instruction cache; One 512-Kbyte shared M2
19		extended	memory for critical data and temporary data buffering; 10
	MSC8144	cores	Mbytes of 128-bit wide shared M3 memory
20		Four 800	
		MHz/1GHz	Four 16-Kbyte L1 instruction cache (one per core); Four
21		StarCore	32-Kbyte L1 data cache (one per core); One 128-Kbyte
		SC3400 DSP	shared L2 instruction cache; One 512-Kbyte shared M2
22		core	memory for critical data and temporary data buffering; 10
	MSC8144E	subsystems	Mbytes of 128-bit wide shared M3 memory
23		Four 800	
		MHz/1GHz	Four 16-Kbyte L1 instruction cache (one per core); Four
24		StarCore	32-Kbyte L1 data cache (one per core); One 128-Kbyte
25		SC3400 DSP	shared L2 instruction cache; One 512-Kbyte shared M2
		core	memory for critical data and temporary data buffering; 10
26		subsystems	Mbytes of 128-bit wide shared M3 memory
	MSC8144EC		64 KB of SRAM memory, a 16 KB 16-way Instruction
27			Cache
28	MSC7110	SC1400 core	
	MSC7112	SC1400 core	192 KB of SRAM memory, a 16 KB 16-way Instruction

1		Cache
2	MSC7113	SC1400 core
3	MSC7115	SC1400 core
4	MSC7116	SC1400 core
5	MSC7118	SC1400 core
6	MSC7119	SC1400 core
7	MSC7120	e300 core
8		Cache
9		192 KB of SRAM memory, a 16 KB 16-way Instruction
10	DSP56301	core
11	DSP56311	core
12	DSP56321	core
13	DSP56L307	core
14		Cache
15		384 KB of SRAM memory, a 16 KB 16-way Instruction
16		Cache
17		384 KB of SRAM memory, a 16 KB 16-way Instruction
18		Cache
19		448 KB of SRAM memory, a 16 KB 16-way Instruction
20		Cache
21		448 KB of SRAM memory, a 16 KB 16-way Instruction
22		Cache
23		16 KB instruction cache and a 16 KB data cache
24		1024-4096 x 24-bit Program RAM (optional
25		configurations)with 1024 x 24-bit Instruction Cache (if
26		enabled); 2048/3072 x 24-bit X data RAM (optional
27		configuration); 2048/3072 x 24-bit Y data RAM (optional
28		configuration)
		128 K x 24-bit on-chip RAM total; Program RAM,
		instruction cache, X data RAM, and Y data RAM sizes
		are variable
		192 K x 24-bit on-chip RAM total; Program RAM,
		instruction cache, X data RAM, and Y data RAM sizes
		are variable
		64 K x 24 on-chip RAM total; Program RAM, instruction
		cache, X data RAM, and Y data RAM sizes are
		programmable; 192 x 24-bit bootstrap ROM

INSTRUCTIONS

A. If you object to any portion of a request, you nonetheless shall provide all documents called for by that portion of the request to which you do not object.

B. If any document or thing is withheld on the basis of privilege, state:

1. The nature of the privilege;
2. The author of the document or thing;
3. All recipient(s) of the document or thing;
4. The identit(ies) of all person(s) who have had access to the withheld document or thing;
5. The date the document or thing was created; and
6. The subject matter of the document or thing.

C. Unless otherwise specified, the time period governing these requests is 1990

1 through the present.

2 **DOCUMENTS AND THINGS REQUESTED**

3 1. All documents reflecting or relating to the conception, design, development, manufacture,
4 analysis, testing, marketing, sales or repair of any Freescale Product.

5 2. All documents relating to the conception, design, development, manufacture, analysis,
6 testing marketing, sales or repair of each cache memory used with, incorporated in or relied upon
7 by a Freescale Product.

8 3. All documents relating to the conception, design, development, manufacture, analysis,
9 testing, marketing, sales or repair of any register(s) used in writing, reading, buffering or
10 accessing data from or to each cache memory used with or in, incorporated in or relied upon by a
11 Freescale Product.

12 4. All documents relating to the conception, design, development, manufacture, analysis,
13 testing, marketing, sales or repair of each cache controller used with or in, incorporated in or
14 relied upon by a Freescale Product.